



July 21, 2021

Lt. Colonel Mike Dunlap
Wisconsin Air National Guard; 115CES/CEIE
Dane County Regional Airport
3110 Mitchell Street, Building 1210
Madison, WI 53704

Subject: Modification of Previously Approved Materials Management Plans; F-35 Construction Projects, Wisconsin Air National Guard 115CES/CEIE, Dane County Regional Airport, Madison
BRRTs #02-13-585319

Dear Lt. Colonel Dunlap:

The Wisconsin Department of Natural Resources (DNR) received a revised materials management plan (MMP) on July 16, 2021 for construction activities related to base modifications necessary for the placement of F-35 jets to the Wisconsin Air National Guard (WANG) base located at the Dane County Airport. This MMP outlines a process for WANG to manage soil and groundwater that is generated during construction activities at the base.

WANG had previously submitted, and DNR had approved, MMPs for several individual construction projects. The July 16, 2021 submittal is meant to replace the previous individually approved MMPs with an overall MMP that will cover all the F-35 construction projects and ensure that contaminated soil is managed in a consistent manner as construction proceeds. The revised proposal calls for segregating soil that contains PFAS compounds from soil that doesn't. Soil that doesn't contain PFAS compounds could be used as clean fill either in on site projects, or, taken from the WANG base and used at another location. Soil containing PFAS compounds would be used at the project area where it originated, or another F-35 construction project on base. This soil will be placed in an area where groundwater presently contains PFAS compounds and it will be placed at a location of a planned impervious surface (i.e., under a building, asphalt, or concrete) as part of the F-35 construction project.

Included with the July 16, 2021 MMP plan are PFAS analytical results of soil and groundwater samples collected from an area to the west of Building 1209. These data indicate that both soil and groundwater in that area contain very high levels of PFAS compounds. PFAS concentrations are similar to those collected at the fire station located adjacent and to the north from the area west of building 1209.

This letter will serve as an approval for the overall approach to managing PFAS contaminated soil at the WANG base at Truax. The WANG will also submit individual maps from each project where soil will be generated. Those maps will present the soil PFAS analytical data gathered at each location and will also present proposed interpretive boundaries between areas of PFAS containing soils and non-PFAS containing soils.

This MMP approval letter is only addressing PFAS contamination in soil. There is PFAS contaminated groundwater throughout the WANG base. Groundwater dewatering is not anticipated for this construction project. This is based on depth to water from the borings completed at this location, and from experience WANG has gained from other construction projects WANG has completed in the past. As such, DNR understands that WANG does not intend to seek a wastewater discharge permit ahead of construction activities. If groundwater is encountered the MMP states that the water will be containerized and sampled. WANG will then either work with the DNR to gain a WPDES permit, or, gain approval from the Madison Metropolitan Sewerage District for discharging to the municipal sewer system.

Plan Approval

The Materials Management Plan is approved subject to the following conditions:

1. Management of excavated soil in conformance with the approved materials management plan shall be completed within one year of the effective date of this letter unless a written extension of this condition is obtained from the DNR.
2. The Wisconsin Air National Guard shall manage excavated material in conformance with the approved materials management plan and shall notify the DNR within 24 hours of discovering material that is not consistent with the contaminant characteristics that have been reported to the DNR or if there are visual or olfactory indications of a contaminant discharge. That material must be segregated and tested to determine appropriate disposal options.
3. If areas of unanticipated soil contamination or discovery of underground storage tanks, piping, drums, etc. are encountered, the DNR shall be notified within 24 hours and appropriate actions to investigate, evaluate, and deal with the situation shall be proposed. Notification of discharge shall be submitted to the Department in accordance with s. NR 706.05(1).
4. The Wisconsin Air National Guard is responsible for obtaining any local, federal, or other applicable state permits to carry out this project. If more than one acre of land is disturbed, a stormwater permit may be required. Contact the DNR's Stormwater Manager to determine what, if any, permit is needed.
5. The Wisconsin Air National Guard shall comply with requirements of s. NR 718.12(2)(d) and (e) Wis. Adm. Code as needed or appropriate.
6. The Wisconsin Air National Guard shall submit a documentation report to the DNR within 90 days of substantial completion of the redevelopment project. The report shall contain the following items:
 - a. As-built drawings documenting compliance with the above conditions of approval.
 - b. A narrative description of how the above conditions were accomplished including relevant documentation.
 - c. Color photographs documenting construction aspects addressed in this approval.
 - d. Documentation of excavation and soil placement activities. The report shall include the description of the total volume and final location/disposition of relocated material.
7. If there is contaminated soil remaining in the area west of B1209 at the completion of the F-35 construction projects WANG shall submit a plan for a permanent resolution for addressing this remaining soil.

The DNR reserves the right to require the submittal of additional information or to modify or revoke this MMP approval if the Wisconsin Air National Guard fails to comply with the requirements of the proposed MMP. The DNR also retains its right to modify or revoke this approval if circumstances or conditions change, or if new information is found which would warrant modification or revocation of this approval.

If you have any questions regarding this approval, please contact Steve Ales at stephenm.ales@wisconsin.gov or 608-400-9187.

Sincerely,



Steven L. Martin, P.G
South Central Region Team Supervisor
Remediation & Redevelopment Program

Cc: Steve Ales – RR/5, GEF 2